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1 2 3 4 5 6 7 8 9	LAUREL I. HANDLEY (NV Bar #009576) GREGG A. HUBLEY (NV Bar #007386) PITE DUNCAN, LLP 701 Bridger Avenue, Suite 700 Las Vegas, NV 89101 MAILING ADDRESS P.O. Box 17935 San Diego, CA 92177-0935 Telephone: (858) 750-7600 Facsimile: (619) 326-2430 E-mail: Lhandley@piteduncan.com Attorneys for Defendants Saxon Mortgage Services and Deutsche Bank National Trust Company as Trustee for IXIS Real Estate Capital Trust 2006-HE1	JISTRICT COURT		
11	UNITED STATES DISTRICT COURT			
12	DISTRICT OF NEVADA			
13	THOMAS KNIPPEL, an individual, and GLORIA KNIPPEL, an individual,	CASE NO. 2:10-cv-001726		
14	Plaintiffs,	VERIFIED PETITION OF P. RUSSELL PERDEW, ESQ. FOR		
15	v.	PERMISSION TO PRACTICE PRO HAC VICE IN THIS CASE AND		
16		DESIGNATION OF LEAD COUNSEL		
17	SAXON MORTGAGE SERVICES; DEUTSCHE BANK NATIONAL TRUST	,		
18	CO.; LENDER PROCESSING SERVICES; LPS DEFAULT SOLUTIONS, INC.; LPS	EFFECTIVE NOVEMBER 11, 2010 FILING FEE IS \$175.00		
19	FORECLOSURE SOLUTIONS, INC.; QUALITY LOAN SERVICE CORP.; MCCARTHY & HOLTHUS, LLP; MOSS	TIEMO FEE IS \$175.00		
20	CODILIS LLP; DOE Defendants I through X, inclusive; and ROE CORPORATIONS A			
21	through Z, inclusive,			
22	Defendants.			
23				
24	P. Russell Perdew, Esq., Petitioner, respec	etfully represents to the Court:		
25	1. Petitioner resides at 216 Spring Avenue, Naperville, Illinois 60540.			
26	2. Petitioner is an attorney at law ar	d a member of the law firm of LOCKE LORD		
27	BISSELL & LIDDELL LLP with offices at 111 So	outh Wacker Drive, Chicago, Illinois 60606 (312)		
28	443-0656, rperdew@lockelord.com.			

3. Petitioner has been retained personally or as a member of the law firm by Saxon Mortgage Services, Inc. and Deutsche Bank National Trust Company as Trustee for IXIS Real Estate Capital Trust 2006-HE1 to provide legal representation in connection with the above-entitled case now pending before this Court.

- 4. Since 1999 Petitioner has been and presently is a member in good standing of the bar of the highest Court of the State of Illinois where Petitioner regularly practices law.
- 5. Petitioner was admitted to practice before the following Courts on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Courts.

Federal/State Admissions	Status (Active/Inactive)	Date Admitted	Bar Number
Supreme Court of Illinois	Active	1999	6270420
U.S. District Court for the Northern District of Illinois	Active	1999	
Supreme Court of Indiana	Active	2000	22617-45
U.S. District Court for the Northern District of Indiana	Active	2001	
U.S. District Court for the Western District of Wisconsin	Active	2005	
U.S. District Court of Appeals for the Seventh Circuit	Active	2007	
United States District Court, Central District of Illinois	Active	2007	
United States District Court, Southern District of Indiana	Active	2007	
United States District Court, Northern District of Florida	Active	2009	
United States Court of Appeals for the Ninth Circuit	Active	2009	
U.S. Bankruptcy Court for the Southern District of Indiana	Active	2010	

6. There are or have been no disciplinary proceedings instituted against Petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below: Not applicable.

- 7. Has Petitioner ever been denied admission to the State Bar of Nevada? (If yes, give particulars of every denied admission): No.
 - 8. Petitioner is a member of good standing in the following Bar Associations:

 American Bar Association; Illinois State Bar Association.
- 9. Petitioner or any member of Petitioner's firm (or office if firm has offices in more than one city) with which Petitioner is associated has/have filed application(s) to appear as counsel under Local Rule IA 10-2 during the past three (3) years in the following matters:

8	Date of Application	Cause	Title of Court Administrative	Was Application Granted or Denied
9			Body or Arbitrator	
10	June 22, 2009; December 3, 2009	Goodwin, et al. v. Executive Trustee Services, LLC., et al; Case No. 3:09-cv- 00306-ECR	United States District Court for the District of Nevada	Both Granted
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12 13	July 8, 2009	Lopez, et al. v. Executive Trustee	United States District Court for the District	Granted
14		Services ,LLC, et al; Case No. 3:09-cv-	of Nevada	
15		180-ECR	TI ' 10' D' ' '	C 1
16	August 3, 2009	Green, et al. v. Countrywide Home Loans, Inc., et al.;	United States District Court for the District of Nevada	Granted
17		Case No. 3:09-cv- 00374-BES	01101444	
18	September 17, 2009	Local AD Link, Inc., et	United States District	Granted
19		al. v. Adzzoo, LLC, et al., Case No. 2:09- cv-01564-RCJ-LRL	Court for the District of Nevada	
20	October 2, 2009	Dalton, et al. v.	United States District	Granted
21	- · · · · · · · · · · · · · · · · · · ·	Citimortgage, Inc., et	Court for the District of Nevada	
22		al.; Case No. 3:09-cv- 00534-ECR-VPC	or nevada	
23	July 14, 2010	State of Nevada, et al. v. Countrywide Home	United States District Court for the District	Granted
24		Loans Servicing LP, et al., Case No. 3:10-cv-	of Nevada	
25		00419-RCJ-PAL		
26	September 23, 2010	Abdolhamid Ahmadi v. Wilson Resources,	United States District Court for the District	Granted
27		Inc., et al., Case No. 3:10-cv-00587 RCJ	of Nevada	
28		VPC		

1	10. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State			
2	of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent			
3	as a member of the State Bar of Nevada.			
4	11. Petitioner agrees to comply with the standards of professional conduct required of the			
5	members of the bar of this court.			
6	12. Petitioner has disclosed in writing to the client that the applicant is not admitted to			
7	practice in this jurisdiction and that the client has consented to such representation.			
8	That Petitioner respectfully prays that Petitioner be admitted to practice before this Court			
9	FOR THE PURPOSES OF THIS CASE ONLY.			
10	P. RUSSELL PERDEW, ESQ.			
11	STATE OF ILLINOIS)			
12	COUNTY OF COOK)			
13	P. Russell Perdew, Esq., Petitioner, being first duly sworn, deposes and says: That the			
14	foregoing statements are true.			
15	P. RUSSELL PERDEW, ESQ.			
16	r. Rossede i erdew, esq.			
17	Subscribed and sworn to before me this			
18	day of November, 2010.			
19	On Proceedings			
20	Notary public or Clerk of Court			
21	"OFFICIAL SEAL" Jo Anne Staton			
22	/././ Notary Public, State of Illinois My Commission Expires 03/26/14			
23	1.1.1			
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25	1.1.1			
26	1.1.1			
27	1.1.1			
28				

DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO THE BAR OF THIS COURT AND CONSENT THERETO. 2 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner 3 believes it to be in the best interests of the client(s) to designate Gregg A. Hubley, Attorney at Law, 4 member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate residence counsel in this action. The address of said designated Nevada counsel is: Pite Duncan, LLP 701 E. Bridger Avenue, Suite 700 Las Vegas, Nevada 89101 8 (702) 991-4632 9 By this designation the Petitioner and undersigned party(ies) agree that this designation 10 constitutes agreement and authorization for the designated resident admitted counsel to sign 11 12 stipulations binding on all of us. APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL 13 The undersigned party(ies) appoints Gregg A. Hubley of PITE DUNCAN LLP as its 14 Designated Resident Nevada Counsel in this case. 15 Saxon Mortgage Services, Inc. 16 Party Signature 17 Deutsche Bank National Trust Company 18 as Trustee for IXIS Real Estate Capital Trust 2006-HE1, by 19 Saxon Mortgage Services, Inc. Party Signature 20 CONSENT OF DESIGNEE 21 dersigned keret consents to serve as associate resident Nevada counsel in this case. 22 23 esident Nevada Counsel's Signature 24 UPON THE COURT'S FINDING OF GOOD CAUSE, 25 **EREBY APPROVED** this 2nd day of December, 2010. 26 27 Gloria M. Navarro 28 United States District Judge